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November 16, 2020

**VIA ECF**

Honorable Philip M. Halpern  
United State District Judge, SDNY  
Daniel Patrick Moynihan  
United States Courthouse  
500 Pearl Street  
New York, New York 10007

Re: Florence Walker v. Dr. Crosley Odell, 17 Civ. 8120 (PMH)

Your Honor:

Application granted.

SO ORDERED.

Philip M. Halpern, U.S.D.J.

Dated: New York, NY  
November 17, 2020

I represent the plaintiff Florence Walker in the above-referenced matter. I write on behalf of plaintiff to respectfully request a two day enlargement of time, from November 16, 2020 to November 18, 2020 for the parties to file their proposed voir dire questions, joint jury charge, and a joint verdict form in compliance with Rule 6(B) of the Court's Individual Practices. Pursuant to the Court's Individual Practices, the parties are trying to reach an agreement regarding the language and content that will be included in each of the documents due to be filed with the Court. Upon review of certain portions of defendant's proposed jury charge, it became necessary for counsel for plaintiff to conduct additional research about whether portions of defendant's proposed instructions are legally correct. Unfortunately, counsel for plaintiff requires additional time complete the research and respectfully requests a short two-day extension of time to complete the research. The extension will give the parties an opportunity to reach an agreement on a larger portion of the proposed jury instructions and will ensure that the parties proposed jury instructions are legally accurate. This is plaintiff's first request for an extension of time for the parties to file these documents. Defendant consents to plaintiff's request. Additionally, plaintiff has agreed to provide defendant with plaintiff's objections to defendant's proposed jury charge before noon on November 18, 2020.

We believe that a two business day enlargement of time November 18, 2020 for the parties to file their proposed voir dire questions, a jury charge, and a verdict form in compliance with Rule 6(B) of the Court's Individual Practices will give the parties enough time to meet and confer and attempt to agree upon as much as possible in the jointly filed documents.

We thank the Court for its consideration of this matter.

Respectfully submitted,

/s

DAVID M. HAZAN, ESQ.